



February 1, 2007

Kris A. Monteith
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 05-287

Dear Ms. Monteith:

Alltel Corporation ("Alltel") submits this first monthly E-911 compliance report pursuant to the requirements set forth in paragraphs 25 and 30 of the Commission's Order of January 5, 2007.¹

I. Percentage of Alltel Customers with Location-Capable Handsets.

Alltel reports that, as of December 31, 2006, 92.3 % of its subscribers in those markets utilizing the AGPS handset based solution for establishing E-911 Phase II compliance had AGPS equipped E-911 Phase II capable handsets.

II. Alltel's Efforts to Encourage Upgrades to Location-Capable Handsets.

Ongoing Customer Contact. Alltel has instituted billing system alerts that identifies accounts that are associated with non-compliant, non-AGPS phones, and alerts Alltel service personnel so that the customer may be advised that the phone(s) on their account are not location-capable. Alltel has also provided its sales and service representatives with a "look up" tool that lists all known non-compliant phones to ensure that only AGPS equipped phones are activated by subscribers to Alltel's network. These tools are available to both consumer and business account representatives.

Direct Marketing and Communications. On a monthly basis, Alltel continues to send "Service Check Up Letters" to certain out of contract subscribers who have non-AGPS compliant phones. These letters are followed up with SMS messages to those customers with text-capable handsets. Alltel will continue to target its efforts for E-911

¹ See, *In the Matter of Alltel Corporation Petition for Limited Waiver of Location-Capable Handset Penetration Rule*, WT Docket No. 05-287, FCC 06-64 (released January 5, 2007) (the "Order"). Pursuant to paragraph 25 of the Order, Alltel is required to file monthly reports beginning on February 1, 2007 setting forth its most current AGPS handset deployment percentage as well as the specific steps it is taking to augment AGPS handset deployment. The instant filing is the first such report. Alltel is separately transmitting to the Commission its latest quarterly E-911 report as also required under paragraph 25 of the Order.

specific marketing campaigns to markets where the PSAPs have launched Phase II E-911 service by sending out E-911 – themed mass mailings to non-compliant customers. Alltel also continues with its program to augment the replacement of analog “bag-phones” with the new Motorola M800 digital bag phone, a high powered device which is also AGPS equipped, and letters notifying subscribers of the availability of the M800 continue to be distributed.

E-911 Education Communications. Alltel will continue to utilize bill inserts, bill messages, in-store displays and collateral materials, as well as web site postings to highlight the benefits of E-911 service and urge customers to ensure that they have an AGPS equipped handset in order to take advantage of the E-911 ALI function where available.

Offers and Incentives. Alltel continues to provide steep discounts to encourage subscribers to upgrade to AGPS capable handsets including offers of a new phone for as little as \$.99 with a two-year service commitment. Alltel continues to permit upgrades without fees. Alltel is also making available refurbished AGPS capable handsets for reduced cost and without a service commitment at its retail outlets. Other special offers and incentives are currently being test marketed, including programs with refurbished phones priced at \$.01 with no service commitment.

Alltel will report next to the Commission on March 1, 2007. Should there be any question or concern regarding this report, please contact undersigned counsel.

Respectfully submitted,

Alltel Corporation

By: 

Glenn S. Rabin

Vice President

Federal Communications Counsel